SEP 22 1999

Via Fax and Mail

Ms. Gwen B. Zervis, P.E.
Case Manager
Bureau of Federal Case Management
New Jersey Department of Environmental Protection
401 East State Street
P. O. Box 028
Trenton NJ 08625

Re: Review of the *Further Off-Site Groundwater Investigation at MW-19/Hot Spot 1 Work Plan*, L.E. Carpenter, Wharton, New Jersey.

Dear Ms. Zervis:

The United States Environmental Protection Agency (EPA) has review the above referenced work plan, and is pleased to provide the following comments for your consideration:

1. Regarding the siting of the three new wells, the well sited on the north side of Ross Street is at a good down-gradient location, however, the two wells on the south side of the street would be better placed to bracket the plume to see if it extends that far. The concern is that the sited locations may likely be contaminated as they are close to wells with high levels of BTEX. The western most well could be moved to the north side of the street, directly across the street from its present position. The remaining well would then be used as an attempt to bracket the eastern edge of the plume, placed just east of HP-2.

2. New wells are to be screened at the water table. As noted in previous EPA and the New Jersey Department of Environmental Protection's (NJDEP) comments, the vertical extent of contamination has not been addressed at the site. This becomes most important in delineating the down-gradient extent of the plume. Clean monitoring wells at the water table will not necessarily determine the farthest extent of the plume. Considering recharge from nearby Washington Forge Pond, a downward component to flow is a valid concern. Therefore, clustered wells with deeper screened intervals are needed at the three new locations. In addition, it would also be prudent to place a deeper well in the source area, perhaps paired with MW-19 or MW-19-1.

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3. Regarding our discussions on the use of adopting a low-flow protocol for groundwater sampling at this site, low-flow is especially relevant in delineating the farthest extent of the plume where contaminant levels may be low. Should you desire, I will be glad to discuss this matter with you further, at your earliest convenience.

4. The figures indicate that water and sewer lines run along Ross Street. If the till layer extends into the water table and has a low hydraulic conductivity, the backfill for these lines could provide a preferred flow pathway, which might explain the presence of DEHP in HP-3. EPA requests that design and/or as built drawings for the lines be reviewed, if available, in attempts to determine if this is a concern.

If you have any questions or comments on the above, please contact me at (212) 637-4411. Thank you for the opportunity to review the above work plan.

Yours truly,

Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section

bcc: Andy Crossland, PSB
Kimberly O'Connell, SNJRS
Stephen Cipot, SNJRS